

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

Gilliam v. Chowdhury, M.D. et al.
No. 1:15-cv-11367-RWZ

**STIPULATION FOR EXTENSION OF TIME
TO RESPOND TO MOTION TO DISMISS**

Pursuant to Section A of MDL Order No. 11, Plaintiff Sarah Gilliam (“Plaintiff”) and Defendant Tim I. Chowdhury (“Defendant”) in the above referenced matter hereby stipulate as follows:

1. Plaintiff does not oppose Defendant’s Motion for Leave to File an Answer or Motion in Response to the Complaint of Plaintiff Sarah Gilliam (Dkt No. 11) and hereby stipulates to the one day extension requested therein;

2. Defendant does not oppose a reasonable extension of the time for Plaintiff to respond to Defendant’s Motion To Dismiss or, In the Alternative, Remand the Case to the U.S. District Court for the Southern District of Ohio (Dkt. No. 12) (the “Motion”). The parties have agreed that Plaintiff’s response to the Motion shall be filed on or before May 18, 2015.

Dated: April 21, 2015

Respectfully submitted,

/s/ Kristen A. Johnson

Thomas M. Sobol, BBO # 471770
Kristen A. Johnson, BBO# 667261
HAGENS BERMAN SOBOL SHAPIRO LLP
55 Cambridge Parkway, Suite 301
Cambridge, MA 02142
(617) 482-3700
tom@hbsslaw.com

kristenj@hbsslaw.com

Counsel for Sarah Gilliam

/s/ Bartholomew T. Freeze

Mark L. Schumacher (Ohio #0018957)

Bartholomew T. Freeze (Ohio #0086980)

FREUND, FREEZE & ARNOLD

Capitol Square Office Building

65 E. State Street, Suite 800

Columbus, OH 43215-4247

(614) 827-7300

mschumacher@ffalaw.com

bfreeze@ffalaw.com

Counsel for Defendant Tim I. Chowdhury, M.D.

CERTIFICATE OF SERVICE

I, Kristen A. Johnson, hereby certify that I caused a copy of the above Stipulation for Extension of Time to Respond to Motion to Dismiss to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: April 21, 2015

/s/ Kristen A. Johnson
Kristen A. Johnson, BBO # 667261